1 Joseph H. Harrington Acting United States Attorney U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON Eastern District of Washington 3 Caitlin Baunsgard AUG 0 3 2021 Assistant United States Attorney 4 SEAN F. McAVOY, CLERK DEPUTY Post Office Box 1494 SPOKANE, WASHINGTON 5 Spokane, WA 99210-1494 Telephone: (509) 353-2767 6 7 UNITED STATES DISTRICT COURT 8 FOR THE EASTERN DISTRICT OF WASHINGTON 9 UNITED STATES OF AMERICA, 4:20-CR-6018-SAB 10 Plaintiff, SUPERSEDING INDICTMENT 11 12 Vio.: 21 U.S.C. § 846, V. 13 Conspiracy to Distribute 400 Grams or More of Fentanyl KYLE RAY CAMPBELL, 14 CAMERON EARL CAMPBELL, (Count 1) 15 LEANN MARIE WAKE, and CASEY RAY BOCKMAN, 21 U.S.C. § 841(a)(1), 16 (b)(1)(A)(vi),17 Possession with the Intent to Defendants. 18 Distribute 400 Grams or More of Fentanyl (Count 2) 19 20 21 U.S.C. § 841(a)(1), (b)(1)(C),21 Distribution of Fentanyl 22 (Counts 3-4) 23 21 U.S.C. § 841(a)(1), 24 (b)(1)(B)(vi),25 Possession with the Intent to Distribute 40 Grams or More 26 of Fentanyl (Count 5) 27 28

SUPERSEDING INDICTMENT - 1

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18 U.S.C. § 924(c)(1)(A), Possession of a Firearm in Furtherance of Drug Trafficking (Count 6)

18 U.S.C. § 2232(a), Attempted Destruction of Evidence to Prevent Search or Seizure (Count 7)

21 U.S.C. § 853, 18 U.S.C. § 924(d)(l), 28 U.S.C. § 2461(c), Forfeiture Allegations

The Grand Jury charges:

#### COUNT 1

Beginning on a date unknown but by on or about October 2019, continuing until on or about June 16, 2020, in the Eastern District of Washington and elsewhere, the Defendants, KYLE RAY CAMPBELL, CAMERON EARL CAMPBELL, LEANN MARIE WAKE, and CASEY RAY BOCKMAN, did knowingly and intentionally combine, conspire, confederate and agree together with each other and other persons, both known and unknown to the Grand Jury, to commit the following offense: distribution of 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi); all in violation of 21 U.S.C. § 846.

## **COUNT 2**

On or about February 12, 2020, in the Eastern District of Washington, the Defendant, CAMERON EARL CAMPBELL, knowingly and intentionally possessed with the intent to distribute 400 grams or more of a mixture or substance

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containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi).

## **COUNT 3**

On or about October 17, 2019, in the Eastern District of Washington, the Defendants, CASEY RAY BOCKMAN and LEANN MARIE WAKE, knowingly and intentionally distributed a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

# **COUNT 4**

On or about October 29, 2019, in the Eastern District of Washington, the Defendants, CASEY RAY BOCKMAN and LEANN MARIE WAKE, knowingly and intentionally distributed a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

## COUNT 5

On or about July 1, 2020, in the Eastern District of Washington, the Defendants, KYLE RAY CAMPBELL and LEANN MARIE WAKE, knowingly and intentionally possessed with the intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi).

#### COUNT 6

On or about July 1, 2020, in the Eastern District of Washington, the Defendants, KYLE RAY CAMPBELL and LEANN MARIE WAKE, did knowingly possess firearms, that is:

- a Ruger Model 10/22 .22 caliber rifle bearing serial number 824-11385;

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- a JMC .308 caliber rifle, [without a discernable manufacturer or serial number];
- a .223 caliber semi-automatic pistol, [without a discernable manufacturer or serial number];
- a .223 caliber rifle, [without a discernable manufacturer or serial number];
- a High Point Model 4095.40 caliber rifle with serial number H31647;
- a Springfield Armory Model 1911A1 .45 caliber semi-automatic pistol bearing serial number WW139515;
- a Russian Model M91-30 7.62 x 54 caliber rifle bearing serial number 9130463842,
- a Mossberg Model 283TB 410 Gauge Shotgun,
- a Stevens Model 320 12-gauge shotgun, bearing serial number 120868J, and
- a North American Arms Model NAA22 .22 caliber revolver bearing serial number L167478

in furtherance of a drug trafficking crime for which he/she may be prosecuted in a court of the United States, to wit: Possession with Intent to Distribute Fentanyl, as charged in Count 5, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi), all in violation of 18 U.S.C. § 924(c)(1)(A).

#### **COUNT 7**

On July 2, 2020, in the Eastern District of Washington, the Defendant, CAMERON EARL CAMPBELL, after the search and seizure of property by the Federal Bureau of Investigation, a person or entity authorized to make such a search and seizure, did knowingly attempt to destroy, damage, or delete information from cellular telephones seized from his residence, for the purpose of preventing and impairing the United States' lawful authority to continue to hold said property under its lawful custody and control, in violation of 18 U.S.C. § 2232(a).

## NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 841, as set forth in this Superseding Indictment, Defendants KYLE RAY CAMPBELL, CAMERON EARL CAMPBELL, LEANN MARIE WAKE, and CASEY RAY BOCKMAN, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense. The property to be forfeited includes, but is not limited to:

# Defendant CASEY RAY BOCKMAN (Counts 1, 3 and 4)

All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, known as 420 South Grant Street, Kennewick, Washington, legally described as follows:

Mary Ann Addition, Block 1, Lot 5. Protective Covenants, 1-26-72.

Assessor's Property Tax Parcel: 1-0489-303-0001-005

If any of the property described above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

Pursuant to 18 U.S.C. § 924(d)(l) and 28 U.S.C. § 2461(c), upon conviction of an offense in violation of 18 U.S.C. § 924(c)(1)(A), as set forth in Count 6 of this Superseding Indictment, Defendants KYLE RAY CAMPBELL and LEANN MARIE WAKE, shall forfeit to the United States of America any firearms and ammunition involved or used in the commission of the offense.

DATED this \_\_3\_ day of August 2021.

Joseph H. Harrington

Acting United States Attorney

Caitlin Baunsgard

Assistant United States Attorney